

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TAKEDA PHARMACEUTICALS U.S.A., INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 18-cv-464-RGA
)	
ZYDUS PHARMACEUTICALS (USA) INC. and CADILA HEALTHCARE LIMITED)	
)	
)	
Defendants.)	
)	

STIPULATION AND DISMISSAL WITHOUT PREJUDICE AND [PROPOSED] ORDER

WHEREAS Takeda Pharmaceuticals USA, Inc. and Defendants Zydus Pharmaceuticals (USA) Inc. and Cadila Healthcare Limited have agreed to terms and conditions for a settlement of this action and have set forth those terms and conditions in a settlement agreement;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their undersigned counsel of record:

1. This action, including all claims, counterclaims and affirmative defenses, is voluntarily dismissed in its entirety without prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii);
2. This Court retains jurisdiction to enforce the settlement agreement and this Order;
and
3. Each party shall bear its own attorneys' fees and costs.

Respectfully submitted,

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*Attorneys for Defendants Zydus Pharmaceuticals
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SO ORDERED this ____ day of _____, 2018.

United States District Judge